

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

OREN ALEXANDER and  
TAL ALEXANDER,

Defendants.

Case No.: 25-CV-2106 (DEH)

**DEFENDANT OREN ALEXANDER'S  
OPPOSITION TO PLAINTIFF'S  
MOTION TO PROCEED  
ANONYMOUSLY**

**AFFIRMATION OF JASON GOLDMAN**

Pursuant to 28 U.S.C. § 1746(a), JASON GOLDMAN declares as follows:

1. I am the principal attorney with The Law Offices of Jason Goldman, counsel to Defendant Oren Alexander in this action. I make this affirmation, based upon my personal knowledge, in support of Defendant Oren Alexander's Opposition to Plaintiff's Motion to Proceed Anonymously.

2. Because the allegations in the Complaint against both Defendant Tal Alexander and Defendant Oren Alexander are identical, and because Plaintiff's Motion to Proceed Anonymously was filed jointly as it relates to both Defendant Tal Alexander and Oren Alexander (*see* ECF Dkts. No. 13, 14), the reasons set forth by Tal Alexander in opposition to Plaintiff's motion (*id.* at 20) apply equally to Oren Alexander.

3. Accordingly, rather than repeating those arguments, Oren Alexander incorporates by reference the grounds set forth in the Memorandum of Law of Tal Alexander (*id.*) as if fully set forth herein and incorporates by reference any and all additional filings in opposition.

4. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
April 7, 2025

/s/ Jason Goldman  
Jason Goldman, Esq.